

ENVIRONMENTAL SERVICES 1190 Corporate Center Dr. Oconomowoc, WI 53066 Tel.: (262) 569-5857

# JUN 01 2017 AWMD/WEMM

May 17, 2017

ES17-L-101 131.3.40

Kenneth Herstowski U.S. EPA Region 7 300 Minnesota Ave Kansas City, KS 66101-2912

Re:

Response to EPA's Notice of Preliminary Findings, Silgan Containers Manufacturing

Corporation, Burlington, IA 52601

EPA ID: IAR000521237

Dear Mr. Kenneth Herstowski:

Silgan Containers Manufacturing Corporation – Burlington, IA ("Silgan") responds herein to the above-referenced Notice of Preliminary Findings (NOPF) pursuant to the Resource Conservation and Recovery Act ("RCRA") inspection on May 2, 2017. The EPA's NOPF is directed to Silgan's facility located at 3725 Division St, Burlington, IA 52601.

These responses are based upon a review of company files that are known to likely contain documents, records, and information relevant to the Notice of Preliminary Findings. Silgan reserves the right to supplement this response consistent with EPA's request.

Finding 1: Failure to label a satellite container with the words "Hazardous Waste" or have its contents identified (40 CFR 262.34(c) (1) (ii)).

A. Silgan had two drums of Non-Hazardous Solid Draw & Ironed (D&I) Waste without labels on them.

Response: Silgan placed Non-Hazardous Labels on the drums identifying them as Solid Draw & Ironed (D&I) Waste.

Finding 2: Failure to keep a satellite container closed except when adding or removing waste (40 CFR 262.34 (c) (1) (i) – 40 CFR 265.173 (a)).

A. Silgan had a satellite container holding Non-Hazardous Solid D&I waste open with the drum lid resting on top of the drum.

Response: Silgan closed the drum with a locking drum ring.

RCRA

Finding 3: Failure to mark a hazardous waste container with an accumulation start date (40 CFR 262.34 (a) (2)).

A. Silgan had eight (8) containers, holding Hazardous Liquid D&I waste, without dates on the hazardous waste labels.

**Response:** Silgan placed dates on the drum labels. Dates were traced back to when the coatings were run.

Finding 4: Failure to have adequate weekly inspections at a hazardous waste container accumulation area (40 CFR 262.34 (a) (1) (i) - 40 CFR 265.17).

A. Silgan performed weekly inspections and documented them, but overlooked several drums when performing the inspection(s).

**Response:** Silgan placed dates on the drum when they were generated. Dates were traced back to when certain coatings were run. Retraining on waste inspections was performed on May 4, 2017.

Finding 5: Failure to provide adequate aisle space for type of container management and emergency equipment used (40 CFR 262.34(a) (4), 265.35).

A. Hazardous waste containers were stored at the time of inspection with the inability to walk around the containers.

**Response:** Silgan positioned the drums with 3 feet of aisle space on each side of the containers.

Pursuant to EPA's NOPF, Silgan may produce records, documents, or copies in support of the responses above.

We trust the information provided sufficiently responds to the EPA's request to respond to the Notice of Preliminary Findings. Should you require any further information or if you have questions, please call me at 262-569-5857 or contact me at <a href="mailto:jkania@silgancontainers.com">jkania@silgancontainers.com</a>.

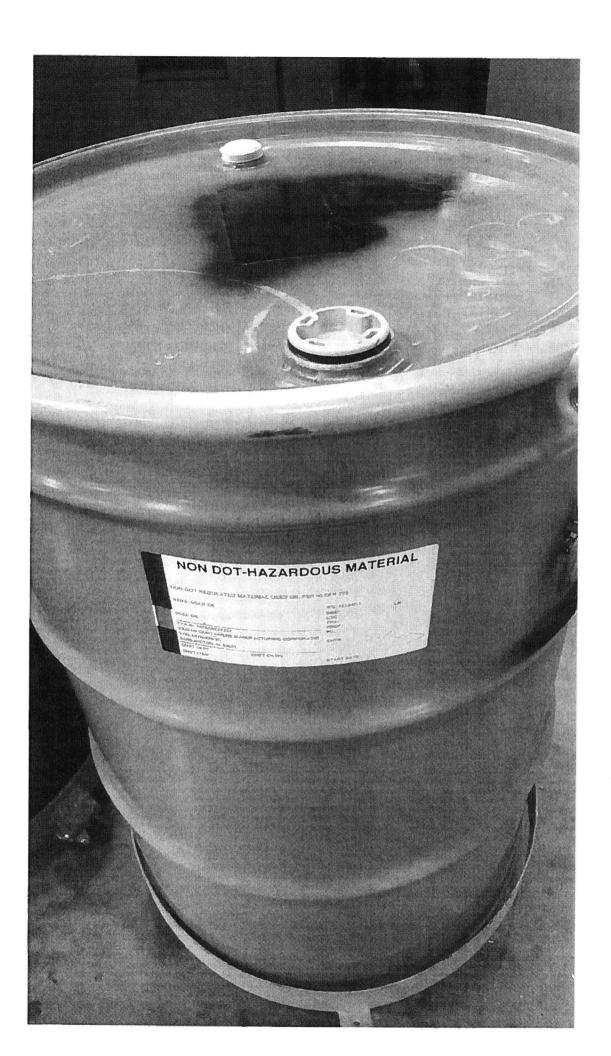
Thank You.

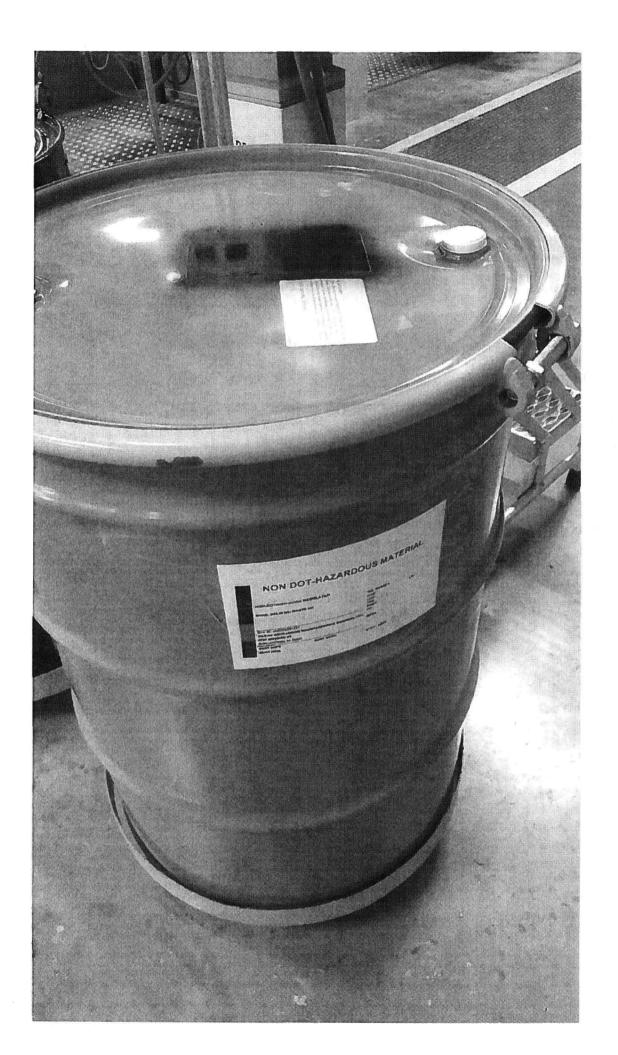
Johathan Kania

Environmental Services

Silgan Containers Manufacturing Corporation

#### Finding 1 & Finding 2: Corrective Action Supporting Evidence







**Analytical Report** 

**ENVision Laboratories, Inc.** 

1439 Sadlier Circle West Drive Indianapolis, IN 46239

Tel: 317.351.8632 Fax: 317.351.8639

www.envisionlaboratories.com

**Client Name:** 

SILGAN CONTAINERS

Project ID:

**BURLINGTON WASTE** 

**Client Project Manager:** 

JONATHAN KANIA

**ENVision Project Number:** 

2017-804

**Analytical Method:** 

TCLP\* VOC Method 5035A/8260B

Prep Method:

Analytical Batch:

Client Sample ID:

SOLID D & I WASTE

**EPA 1311** 

Sample Collection Date/Time:

3/22/17

**Envision Sample Number:** 

17-5537 solid

15:00 Sample Received Date/Time: 3/24/17 10:20

Sample Matrix:

Compounds	Sample Results (mg/L	Reporting Limit (mg/L)	Flags
Benzene	0.14	0.1	**************************************
Methyl ethyl ketone (MEK)	< 0.2	0.2	
Carbon Tetrachloride	< 0.1	0.1	
Chlorobenzene	< 0.1	0.1	
Chloroform	< 0.1	0.1	
1,2-Dichloroethane	< 0.1	0.1	
1,1-Dichloroethene	< 0.1	0.1	
Tetrachloroethene	< 0.1	0.1	
Trichloroethene	< 0.1	0.1	
Vinyl Chloride	< 0.04	0.04	
Dibromofluoromethane (surrogate)	102%		
1,2-Dichloroethane-d4 (surrogate)	92%		
Toluene-d8 (surrogate)	100%		
4-bromofluorobenzene (surrogate)	90%		
Analysis Date/Time:	3-27-17/18:07		
Analyst Initials	gjd		

<sup>\*</sup> TCLP analysis is not included in our NELAC accreditation.

#### Analytical Report ENVISION

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**Client Name:** 

SILGAN CONTAINERS

Project ID:

**BURLINGTON WASTE** 

Client Project Manager:

JONATHAN KANIA

**ENVision Project Number:** 

2017-804

**Analytical Method:** 

TCLP\* BNA Compounds Method 3510C/8270C

Prep Method:

**EPA 1311** 

Analytical Batch:

032717TCLP

Client Sample ID:

SOLID D & I WASTE

Sample Collection Date/Time:

3/22/17

15:00

**Envision Sample Number:** 

17-5537 solid

Sample Received Date/Time:

3/24/17 10:20

Sample Matrix:

Compounds	Sample Results (mg/L)	Reporting Limit (mg/L)	Flags
1,4-Dichlorobenzene	< 0.1	0.1	einnennesthellenien
2,4-Dinitrotoluene	< 0.1	0.1	
Hexachlorobenzene	< 0.1	0.1	
Hexachlorobutadiene	< 0.1	0.1	
Hexachloroethane	< 0.1	0.1	
o-Cresol	< 0.1	0.1	
m&P-Cresol	< 0.1	0.1	
Nitrobenzene	< 0.1	0.1	
Pentachlorophenol	< 0.5	0.5	
Pyridine	< 0.5	0.5	
2,4,5-Trichlorophenol	< 0.1	0,1	
2,4,6-Trichlorophenol	< 0.1	0.1	
2-Fluorophenol (surrogate)	21%		
Phenol-d6 (surrogate)	58%		
Nitrobenzene-d5 (surrogate)	37%		
2-Fluorobiphenyl (surrogate)	58%		
2,4,6-Tribromophenol (surrogate	33%		
p-Terphenyl-d14 (surrogate)	47%		
Analysis Date/Time:	3-29-17/09:44		
Analyst Initials:	ajg		
Date Extracted:	3/27/2017		
Initial Sample Volume:	200 mL		
Final Volume:	1.0 mL		

<sup>\*</sup> TCLP analysis is not included in our NELAC accreditation.

### Analytical Report ENVISION

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**Client Name:** 

SILGAN CONTAINERS

Project ID:

**BURLINGTON WASTE** 

**Client Project Manager:** 

JONATHAN KANIA

**ENVision Project Number:** 

2017-804

**Analytical Method:** 

TCLP\* Metals 6010B ICP / 7471A Mercury

Prep Method:

EPA 1311

Client Sample ID:

SOLID D & I WASTE

: 5

Sample Collection Date/Time: Sample Received Date/Time:

3/22/17

3/24/17

15:00 10:20

Envision Sample Number: Sample Matrix:

17-5537 solid

Compounds	Sample Results (mg/L)	Reporting Limit (mg/L)	Flags
Arsenic	< 0.01	0.01	
Barium	< 0.1	0.1	
Cadmium	< 0.005	0.005	
Chromium	< 0.01	0.01	
Lead	0.075	0.01	
Mercury	< 0.002	0.002	
Selenium	< 0.01	0.01	
Silver	< 0.05	0.05	

Analysis Date/Time:	3-28-17/14:15	Hg Analysis Date/Time: Hg Analyst Initials: Date Digested: Initial Sample Volume: Final Volume: Analytical Batch:	3-28-17/11:21
Analyst Initials:	gjd		ajg
Date Digested:	3/27/2017		3/28/2017
Initial Sample Volume:	50 ml		50 ml
Final Volume:	50 ml		50 ml
Analytical Batch:	032817icp		032817hg

<sup>\*</sup> TCLP analysis is not included in our NELAC accreditation.



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Fax: 317.351.8639 www.envisionlaboratories.com

**Client Name:** 

SILGAN CONTAINERS

Project ID:

**BURLINGTON WASTE** 

Client Project Manager:

JONATHAN KANIA

**ENVision Project Number: 2017-804** 

Client Sample ID:

SOLID D & I WASTE

Sample Collection Date/Time:

3/22/17 15:00

**Envision Sample Number:** 

17-5537

Sample Received Date/Time:

@ 25 deg C

Sample Matrix:

solid

3/24/17 10:20

**Analyte** 

Sample Results

pH

8.55

03-24-17/12:30

**Flags** 

Method 9045C

Analysis Date/Time: **Analyst Initials** 

LLL

Your Projects. Our Passion.



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**Client Name:** 

SILGAN CONTAINERS

Project ID:

**BURLINGTON WASTE** 

Client Project Manager:

JONATHAN KANIA

**ENVision Project Number: 2017-804** 

Client Sample ID:

SOLID D & I WASTE

Sample Collection Date/Time:

3/22/17 15:00

**Envision Sample Number:** 

17-5537

Sample Received Date/Time:

3/24/17 10:20

Sample Matrix:

solid

Wrong Method

**Analyte** 

Flash Point Closed Cup

Sample Results

Flash @ 140 deg F

Method **Flags** 1010A-M

Analysis Date/Time: Analyst Initials

3/27/2017

jc



#### CERTIFICATE OF ANALYSIS

Eurofins SF Analytical Laboratories 2345 S. 170th St. New Berlin, WI 53151-2701 www.eurofinsus.com Tel +1 262 754 5300 Fax +1 262 754 5310

Client Code: TK0000586

PO Number:

Report Date:05/03/2017 Entry Date:04/28/2017

AR-17-TK-000739-01

Eurofins Sample Code, 200-2017-04280008

Sample Condition: Acceptable

Sample Description: Solid D&I Waste B

Test

Silgan Containers

3725 Division St

Burlington, IA 52601

Attn: Johnathan Kania

TK442 - Flash Point-Small Scale CC ASTM D3278

Flash Point, Small Scale Closed Cup

Result

Method Reference

>233 °F

ASTM D 3278/D 3828

Respectfully Submitted, Eurofins Scientific, Inc.

> Joshua Rhein Chemistry Manager

Results shown in this report relate solely to the item submitted for analysis. All results are reported on an "As Received" basis unless otherwise stated. Reports shall not be reproduced except in full without written permission of Eurofins Scientific, Inc.

#### Jonathan Kania

From: Sent:

dnorris@envision|aboratories.com Wednesday, May 10, 2017 7:23 AM

To: Subject: Jonathan Kania RE: Solid D&I Waste

Jon.

We are in the process of re-running the flashpoints. I believe we have figured out the error. I watched the analyst run the flashpoint on one of the samples and it produced a blue "halo" around the opening of the cup. The analyst mistakenly recorded that as the flashpoint. It is not. I am asking our QA officer to observe the re-running of the samples and will get you the revised results as

soon as I can.

I apologize for this error and will get it fixed ASAP.

Thank you, David E. Norris Client Services Manager ENVision Laboratories, Inc. 1439 Sadlier Circle West Drive Indianapolis, IN 46239

ph: 317-351-8632 fax: 317-351-8639

Confidentiality Notice: The information contained in this message is intended for the use of the addressee, and may be confidential and/or privileged. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

----- Original Message -----Subject: RE: Solid D&I Waste

From: Jonathan Kania < JKania @ Silgancontainers.com >

Date: Mon, May 08, 2017 3:29 pm To: "dnorris@envisionlaboratories.com" <dnorris@envisionlaboratories.com>

David,

We suspect something is wrong with these results. We submitted split samples of the same material to another lab in which it tested out at 233F. They used ASTM 3278 and Envision used 1010A-M. If you could please give us a detailed reason for the difference.

Thanks.

Jonathan Kania, CHMM **Environmental Services** Silgan Containers Office: 262,569,5857

Cell: 630.418.2079



**ENVision Laboratories, Inc.** 1439 Sadlier Circle West Drive

Indianapolis, IN 46239 Tel: 317.351.8632

Fax: 317.351.8639 www.envisionlaboratories.com

**Client Name:** 

SILGAN CONTAINERS

Project ID:

SOLID D & I WASTE

Client Project Manager:

**JON KANIA** 

**ENVision Project Number: 2017-1157** 

Client Sample ID:

SOLID D & I WASTE A Sample Collection Date/Time:

4/27/17 8:00

**Envision Sample Number:** 

17-7846

Sample Received Date/Time:

10:15 4/28/17

Sample Matrix:

Flash Point - Closed Cup

solid

**Analyte** 

Sample Results

deg F

No Flash @ 212

Method **Flags** 

1010A-M

Analysis Date/Time: **Analyst Initials** 

5/11/2017

JC

#### Finding 3 & Finding 4: Corrective Action Supporting Evidence

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTI	E (SOLVENT)	WS: 151842-4 . LA
D001	-(66272111)	MTN:
		LOC:
		TRX: PROF:

EPA ID: IAR000521237 PC:

SILGAN CONTAINERS MANUFACTURING CORPORATIO 3725 DIVISION ST.

BURLINGTON, IA 52601

CUST DEPT: CUST CNTR: CUST ITEM:

CNTR:

START DATE: 4/1/17

UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If lower nearest Police or Public Salety authority or the U.S. Emmontes Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOSU KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

D001

WS: 151842-4

MTN: LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATIO

3725 DIVISION ST.

**BURLINGTON, IA 52601** 

CUST DEPT:

CUST CNTR:

CUST ITEM:

START DAT

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the rearest Police or Public Safety authority or the U.S. Environmental Policies

STWASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGIL (BUTANOL, METHYL ISOBUTYL SETUNE ERGHIZE

NAME LIQUID DAI WASTE (SOLVENT)

WATER CONTAINERS MANUFACTURING CORPORATIO

MUSIC ACTION IN SESSE

CUST ONTR:

WS: 151342-4

MITTE

LOC: TEXX:

PROF:

CWTB:

START DATE: 3/1/17

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection

UN1993.WASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII,(BUTANOL,METHYL ISOBUTYL

NAME: LIQUID D&I WASTE (SOLVENT)

WS: 151842-4

MTN: LOC:

TRX:

PROF:

LN:

EPA ID: IAR000521237 SIGAN CONTAINERS MANUFACTURING CORPORATIO EURLINGTON, IA 52601

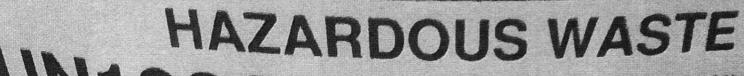
PC: CNTR:

CAST DEPT:

COST ITEM

CUST CNTR:

START DATE: 3-21-17



FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection

Agency.

Agency.

KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

WS: 151842-4 MTN:

IN:

LOC:

TRX:

PROF:

EPA ID: IAPRISE21237

SUGAN CONTLINEDS MANUFACTURING CORPORATIO

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection

LN:

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII,(BUTANOL,METHYL ISOBUTYL

MAME LIQUID D& WASTE (SOLVENT) EPA 19: (ASPONSS21237 SLGAN CONTAINERS MANUFACTURING CORPORATIO 10923 AI BOTDBLIGG

WS: 151842-4

MTN: Loc-TRX-

PROF: PC:

CNTR:

CUST CNTR:

START DATE:

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection

MESSENASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII,(BUTANOL,METHYL ISOBUTYL NETWE ENGINE

LOUD DE WASTE (SOLVENT)

WS: 151842-4

MTN:

LOC:

TRX. PROF-

PC:

CONTAMERS MANUFACTURING CORPORATIO

CNTR:

COST CALLS

LN:

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

WASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII,(BUTANOL,METHYL ISOBUTYL VETONE ERG#128

NAME: LIBUID D&I WASTE (SOLVENT)

WS: 151842-4

LN:

LOC: TRX:

MTN:

PROF: PC:

SALGAN CONTAINERS MANUFACTURING CORPORATIO SINCHOTON IA 52601

CNTR:

EPA 10 1AR000521237

CUST CHTR:

START DATE:

4-2-17

Kelly Monis Redraining 5-4-17

Train - Travi Baysing

Signature  What Ending  All chacks within a gry but and be defined action.  What Ending  Heterorium Wester Storage Area  Yes No. Yes N	Month Inspector:		SILGAN									
West Ending   Water Storage Are	Signature		<b>-</b>	All chec	cks within	a omy ho	y muset he	o anthina e	ad undar	"comarting	a actions	
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Are any containers open?			Vaste Stor	age Area						***************************************		•
Ava any containers open?   Ava any containers open?   Ava any containers open?   Ava any container hands budging?   Ava any container hands on the integrity is compromed??   Ava and to the integrity is compromed?   Ava and to the integrity is an any and to previous comeins represent any and any			<del></del>	T	Т	No	Yes	No	Yes	No	Yes	
Container(s)   Are any containers decided so the hitspiry) is compromised?		Are any containers open?										_
Are any constantes teached to the integrity is compromised?  Are any constantes teached?  Are any constantes teached?  Contained;  Ideated to the constantes teached?  Contained;  Ideated to work the constantes teached?  Contained;  Ideated to the description on the contained teach mach the contents?  Labeling  Labe		Are any containers severely rusted?										
Accompliance   Security   Securit	Container(s)	Are any container heads builging?										
Accompliance   Section   S		Are any containers denied so the integrity is compromised?										
Container(s)  Marking and Labelling Are about sugble and a container beer make the container (s)?  Container(s)  Marking and Container(s)  Inable of previous contents removed or obsogree?  Label of previous contents removed or obsogree?  Are incompatible organized with about sugble and in pood condition?  Are incompatible organized with about sugble and in pood condition?  Are incompatible organized with about sugble and in pood condition?  Are incompatible organized with about sugble and in pood conditions?  Are incompatible organized with about sugble and in pood conditions?  Are incompatible organized with about sugble and and an about about a sugble organized from each other (learnolls: no obstitute by familiary defects?  Are are secured? Doors, gates obseed, locked?  Are any incompatible organized and are suggle organized and are all and a learnolls or any leaks or residues on the foor?  Are any containers and are suggletic and are all												
Consistency Marking and Labeling Marking and Labeling Marking and Marking and Labeling Marking and Marking and Labeling Marking and		Accumulation start date marked on all container(s)?			1					1		
Marking and Class the description on the container label match the contents?  Are labels legible and in good condition?  Labeling  Labeling the service of the container of the contents of the contents of the container of the container state of the cont	Container(s)											*
Are is basis legible and in good condition?  Labled of previous continents removed or obscured?  An effectual sails space (15) present?  Are containers stored with labels leging outward?  Are an are secured? Doors, gates closed, bocked?  Obes the containers spaceated from act or the foor?  Instalio Store Area  Instalio Store Area  Satellite Accumulation Area(s)  **Satellite Accumulation Area(s)**  **Corrective Actions:**  **Satellite Accumulation Area(s)**  **Corrective Actions:**  **Satellite Accumulation Area(s)**  **Are any containers severely rusted?**  Are any containers severely rusted?*  Are any containers severely rusted?  Are any containers severely rusted?  Are any containers tested to the inleginty is compromised?  Are any containers leaving?  Are any containers leaving label on all containers(s)?  Container(s)  Basing and  Lubelling  Lubelling  Storage  **Subscription**  **Emergency Response Equipment**  **Storage**  **Storage**  **Storage**  **Storage**  **Storage**  **Storage**  **Storage**  **Storage**  **It despitone easily accessible in case of emergency?*  **Storage**  **S	Marking and											**
Labels of previous contents removed or obscured?    Se dequate side space (19") present?	Labeling										1	~
Satellite Accumulation Area(s)  Corrective Actions:  Satellite Accumulation Area(s)  Are any containers closed?  Are any containers closed?  Are any containers severely nusted?  Are any containers severely nusted?  Are any containers severely nusted?  Are any container settled so the integrity is compromised?  Are any container leading of the integrity is compromised?  Are any containers severely nusted?  Are any containers leading?  Are any containers leading?  Are any containers between the severely nusted?  Are any containers leading?  Are any containers between or become any leading and leading												•
Are containers stored with labels facing outward?  Are incompatible containers separated from ask other? (example: no width by causice and no conditions by fairmatibles)  In the area secured? Doors, gates closed, tocked?  Area			1				<b>T</b>				1	•
Container(s)  Are incompatible containers separated from each other? (example: no acids by exaustics and conditions by faminables)  Inatics Store Area  Inatics Store Area  Inatics Store Area  To container(s) Is area identified as Hazardous Wasta Storago Area?  Corrective Actions:  Satelite Accumulation Area(s)  Are containers closed?  Are any containers closed?  Are any containers closed?  Are any containers leaking?  Are any containers and leaking leaking?  Are any containers leaking?  Are any containers on the container temporal or obscured?  Are full, tsellet are containers greated than 3 days old?  It she accumulation point fixe of severe structural deterioration?  Are drip pans and palls emply?  Corrective Actions:  Emergency Response Equipment  Yes No Yes In Yes												
acids by castiscs and no colitions by fammables)	Container(s)		1		1		<b>†</b>		1		<b>†</b>	,
Inside Store Area  Does the containment area have structural defects?  Are there are yields or readdures on the foor?  Corrective Actions:  Satelite Accumulation Area(s)  Are containers closed?  Are any containers severely rusted?  Are any containers and rusted in a severely rusted?  Are any containers and rusted in a severely rusted of severely rusted in a severely rusted i		acids by causics and no oxidizers by flammables)										
Instic Store Area  Does the containment area have structural defects?  Are there are yleaks or residues on the Boo? Are the area yleaks or residues on the Boo?  Satellite Accumulation Area(s)  Corrective Actions:  Satellite Accumulation Area(s)  Are container(s) Are any containers closed? Are any containers severely rusted? Are any containers asserely rusted? Are any containers asserely rusted? Are any containers asserely rusted? Are any container asserely rusted? Are any containers asserely rusted? Are any containers asserely rusted? Are any container asserely rusted? Are any containers asserely rusted? Are non-self dosing funnels closed and latched? Hitzardous waste warning table on all container(s)? Marking and Labelling Labellin		is the area secured? Doors, gates closed, locked?										
Are there are y leaks or residues on the floor?    Satelitte Accumulation Area(s)	In add - Pa	Does the containment area have structural defects?										- COCCOO
Are containers closed?   Yes   No   Yes		Are there any leaks or residues on the floor?										APPROPRIES.
Are containers closed?   Yes   No   Yes												•
Container(s) Condition  Are any containers severely rusted?  Are any containers budging?  Are any containers deads budging?  Are any containers leaking?  Does the description on the container lebel match the contents?  Are tablets legible and in good condition?  Labeling leakel septle and in good condition?  Are FULL stellite area containers greater than 3 days old?  Is the accumulation point tire of severe structural deterioration?  Is the accumulation point tire of severe structural deterioration?  Is adequate side space (18") present?  Are drip pans and pais empty?  Corrective Actions:  Emergancy Response Equipment  Yes No Yes Mo Yes Mo Yes Papili Control  Stallephone in working order?  Are emergancy numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is unused ebsorbent material nearby and readily accessible?  Is all personal protective equipment hearby? (example: gloves, boots, aporto, goggles).		Satellite Acc	7		Yes	No	Yes	No	Yes	No	Yes	B.0000000
Container(s) Condition Are any container heads builging? Are any containers dented so the integrity is compromised? Are non-self closing funnels closed and latched? Hazardous waste warning label on all container(s) Marking and Labeling L		Are containers closed?										*
Container(s) Are any containers dented so the integrity is compromised? Are any containers leaking? Are non-self closing funnels closed and latched? Are non-self closing funnels closed and latched?  Are non-self closing funnels closed and latched?  Are non-self closing funnels closed and latched?  Does the description on the container(s)?  Does the description on the container label match the contents?  Are tabels legible and in good condition?  Labeling Labeling  Are FULL satellite area containers greater than 3 days old?  Is the accumulation point free of severe structural detenioration?  Is adequate alse space (18") present?  Are drip pans and pails empty?  Corrective Actions:  Emergency Response Equipment  Yes No Yes and Yes Integration of the present o		Are any containers severely rusted?										8000000
Are any containers elabing?  Are any containers leaking?  Are non-self dosing funnels closed and laiched?  Hazardous weste warning label on all container(s)?  Container(e) Marking and Labeling  Container(e) Marking and Labeling  Are labels legible and in good condition?  Are labels legible and in good condition?  Labels of previous contents removed or obscured?  Are FULL saleilise area containers greater than 3 days old?  Is the accumulation point free of severe structural deterioration?  Emergency Response Equipment  Control  Yes No Yes Mo Yes Is telephone easily accessible in case of emergency?  Is telephone in working order?  Are emergency numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is unused absorbent material nearby and readily accessible?  Is all personal protective equipment nearby? (example: gloves, boots, apron., goggles)  Fire Safety Is a fire extinguisher nearby, in tact, & readily accessible?		Are any container heads bulging?										200000
Are non-self closing funnels closed and latched?  Hazardous waste waming label on all container(s)?  Does the description on the container (she match the contents?  Are tabeling labeling and Labeling Labelis gipible and in good condition?  Labels of previous contents removed or obscured?  Are FULL satelitie area containers greater than 3 days old?  Is the accumulation point free of severe structural deterioration?  Is adequate siste space (18") present?  Are drip pans and pails empty?  **Corrective Actions:**  **Emergancy Response Equipment**  **Corrective Actions:**  **Emergancy Response Equipment**  **Emergancy Response Equipment**  **Peliaphone**  **Is telephone easily accessible in case of emergancy?  Is telephone in working order?  Are emergancy numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is unused absorbent material nearby and readily accessible?  Is all personal protective equipment nearby? (example: gloves, boots, apron, googles)  Is a fire extinguisher nearby, in tact, & roadily accessible?  Is a fire extinguisher nearby, in tact, & roadily accessible?  Is a fire extinguisher nearby, in tact, & roadily accessible?  Is a fire extinguisher nearby, in tact, & roadily accessible?	Condition	Are any containers dented so the integrity is compromised?										
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Container(s) Marking and Labeling  Are labels legible and in good condition? Labels of previous contents removed or obscured?  Are FULL satelities area containers greater than 3 days old?  Storage  Container(s) Storage  Are drip pans and paits empty?  Corrective Actions:  Emergency Response Equipment  Yes No Yes Spill Control Is telephone easily accessible in case of emergency? Is an empty salvage drum nearby and readily accessible?  Is an empty salvage drum nearby and readily accessible? Is all personal protective equipment nearby? (example: gloves, boots, apron, goggles)  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?  Is a fire extinguisher nearby, in tact, & readily accessible?		Are non-self closing funnels closed and latched?										
Are labels legible and in good condition?  Labels of previous contents removed or obscured?  Are FULL satelite area containers greater than 3 days old?  St the accumulation point free of severe structural deterioration?  Is adequate siste space (18") present?  Are drip pans and pails empty?  Corrective Actions:  Emergency Response Equipment  Yes No Yes No Yes No Yes No Yes No Yes No Yes St telephone asady accessible in case of emergency?  Is telephone in working order?  Are emergency numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is unused ebsorbent material nearby and readily accessible?  Is all personal protective equipment nearby? (example: gloves, boots, apron, goggles)  Is a fire extinguisher nearby, in tact, & roadily accessible?  Is a fire extinguisher nearby, in tact, & roadily accessible?  Is a fire extinguisher nearby, in tact, & roadily accessible?		Hazardous waste warning label on all container(s)?										
Labeling Labeling   Labels of previous contents removed or obscured?		Does the description on the container label match the contents?										
Labels of previous contents removed or obscured?  Are FULL satellite area containers greater than 3 days old?  Is the accumulation point free of severe structural deterioration?  Is adequate alse space (18") present?  Are drip pans and pails empty?  Corrective Actions:  Emergancy Response Equipment  Yes No Yes Stelephone in working order?  Are emergancy numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is all personal protective equipment nearby? (example: gloves, boots, apron, goggles)  Is a fire extinguisher nearby, in tact, & roadily accessible?		Are labels legible and in good condition?	,									
Container(s) Storage   S the accumulation point free of severe structural deterioration?   S adequate alse space (18") present?   S ade		Labels of previous contents removed or obscured?										
Storage   Stor	······································	Are FULL satellite area containers greater than 3 days old?										
Storage   b. adequate alste space (18") present?  Are drip pans and pails empty?    Corrective Actions:	Container(s)	Is the accumulation point free of severe structural deterioration?										,
Telephone    Septil Control   Sumused absorbent material nearby and readily accessible?   Saffer extinguisher nearby, in tact, & roadily accessible?   Saffer extinguisher nearby, in tact, & roadily accessible?	Storage											
Telephone   Yes   No		Are drip pans and pails empty?						<u> </u>			l	
Spill Control   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby and tacter nea		Corrective Actions:								****		2
Is telephone easily accessible in case of emergency?  Is telephone in working order?  Are emergency numbers posted nearby?  Is an empty salvage drum nearby and readily accessible?  Is unused absorbent material nearby and readily accessible?  Is all personal protective equipment nearby? (example: gloves, boots, apron, goggles)  Fire Safety  Is a fire extinguisher nearby, in tact, & readily accessible?		Emergancy Re	T			No	Vac	No.	V	No.	Vac	
Spill Control   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?   Is a fire extinguisher nearby, in tact, & roadily accessible?		Is telephone easily accessible in case of emergency?	,	0	1.00	0	103	****		740	, 00	•
Fire Safety Is a fire extinguisher nearby, in tact, & readily accessible?	Telephone		1									•
Fire Safety Is a fire extinguisher nearby, in tact, & roadily accessible?												
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Fire Safety Is a fire extinguisher nearby, in tact, & readily accessible?	apin Control											
The state second second () its tools of typical subdisplaced (		apron, goggles)										
Corrective Actions:	Fire Safety	ls a fire extinguisher nearby, in tact, & roadily accessible?										
		Corrective Actions:										

#### Finding 5: Corrective Action Supporting Evidence

